Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Petition by In-Flight Phone Corp. for Acceptance of Application Or, Alternatively, Waiver of Section 1.402(c) of the Rules To Permit Consideration of an Application for Pioneer's Preference for Airline Audio Service in the 900 MHz Band	)	CC Docket No. 92-100

TO: The Commission

OPPOSITION TO PETITION FOR ACCEPTANCE OF APPLICATION OR RULE WAIVER AND LIMITED OPPOSITION TO APPLICATION FOR PIONEER'S PREFERENCE

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SUMMARY

In-Flight Phone Corporation ("In-Flight") has filed an untimely request for a Pioneer's Preference Application for a license in the 900 MHz Personal Communications Service ("PCS") to provide a commercial ground-to-air audio broadcast retransmission service ("Application"). In-Flight's Application was filed long after the June 1, 1992 deadline for the filing of Pioneer's Preferences for services proposing to operate in the 900 MHz PCS bands. In-Flight's Petition which requests the Commission to accept its late filed Application should be denied, and the Application should be returned as being procedurally defective.

In-Flight's proposed service will simply retransmit several channels of live over-the-air radio programming to aircraft and therefore is functionally an aeronautical radio broadcast service, which service constitutes a "broadcast" service that the Commission has clearly indicated will be ineligible to be licensed as a 900 MHz PCS service. Since In-Flight's proposed broadcast retransmission service is not eligible to be licensed in the 900 MHz PCS frequencies, its Pioneer's Preference Application was erroneously filed in ET Docket No. 92-100. Rather, In-Flight was required to file a separate rulemaking petition with its Application seeking an allocation of spectrum to its proposed service. In-Flight's failure to file the required rulemaking petition renders its Application procedurally defective requiring the denial of its Petition and dismissal of its Application.

Even assuming arguendo that In-Flight's proposed ground-to-air broadcast retransmission service is eligible to be licensed as a 900 MHz PCS service, In-Flight's Petition must nevertheless be denied because its application was filed grossly out of time. Contrary to In-Flight's claims, the Commission established in ET Docket No. 92-100 a June 1, 1992 deadline for the filing of all requests for pioneer's preferences in the 900 MHz range. Since In-Flight did not file its application until almost five months after the deadline for filing pioneer's preference requests in the 900 MHz band, its Petition must be denied and its Application dismissed as untimely filed.

In its Application, In-Flight makes the false claim that Claircom Communication Group, L.P. ("Claircom") in its experimental license application for a ground-to-air broadcast retransmission service "plagiarized" from In-Flight's earlier filed application. An even cursory comparison of the two experimental license applications, however, shows that the two proposals were markedly different. For example, whereas In-Flight originally proposed purely analog transmissions, Claircom proposed to test both analog and digital transmission techniques. In addition, only Claircom proposed to conduct experiments of the ground-to-air transmission of video programming. It is thus apparent that In-Flight's self-serving and gratuitous statement is patently false.

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OPPOSITION TO PETITION FOR ACCEPTANCE OF APPLICATION OR RULE WAIVER AND LIMITED OPPOSITION TO APPLICATION FOR PIONEER'S PREFERENCE

Claircom Communications Group, L.P. ("Claircom")1/, by its attorneys, hereby opposes the Petition for Acceptance of Application or Rule Waiver ("Petition") filed by In-Flight Phone Corporation ("In-Flight") on October 30, 1992 in the above-captioned matter.2/ In addition, Claircom opposes on procedural grounds In-Flight's related Application for Pioneer's Preference to Operate a Live Audio News, Information, and

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1/ Claircom is one of six permittees authorized to provide commercial 800 MHz air-to-ground radio telephone service on a nationwide basis. Claircom holds an experimental authorization to develop and test a ground-to-air video and audio service. See infra at 15.

2/ ET Docket No. 92-100 encompasses proposals for narrowband data or paging services in the 900 MHz range and was combined with GEN Docket No. 90-314, the Commission's proceeding involving personal communications services in the 2 GHz band. See Amendment of the Commission's Rules to Establish New Personal Communications Services, Notice of Proposed Rule Making and Tentative Decision, 7 FCC Rcd 5676 (FCC 92-333) (1992) ("Notice").

Entertainment Service for Airline Passengers on the 901-902 and 940-941 MHz Bands, also filed on October 30, 1992 ("Application").3/ For the reasons set forth below, In-Flight's Petition should be denied and its Application returned as procedurally defective.4/

I. INTRODUCTION

On October 30, 1992, In-Flight filed its Application seeking a pioneer's preference for a license to operate in the Commission's newly proposed 900 MHz Personal Communications Service ("PCS"). Application at 1. Recognizing that the FCC

3/ Claircom is reserving its comments regarding the substantive merits of In-Flight's Application until, and if, the Federal Communications Commission ("Commission" or "FCC") accepts the Application and issues a public notice requesting comment thereon.

4/ The Commission's rules provide for the filing of comments on In-Flight's Application within 30 days following the issuance of an FCC public notice of the filing of the Application. See 47 C.F.R. §1.402 (1991). The Commission, however, has yet to issue a public notice requesting such comments. The public interest, however, can be best served by the Commission's consideration of the threshold issue of whether In-Flight's Application should be accepted before Commission resources are expended to request comments on the Application and evaluate the merits of the procedurally defective Application. The filing of an opposition to In-Flight's Petition appears to be governed by Section 1.45(a), the Commission's general provision regarding the filing of oppositions. See 47 C.F.R. Section 1.45(a). Although Section 1.45(a) provides that oppositions shall be filed within 10 days after the original pleading is filed, In-Flight's Petition and related Application were not served on Claircom. To the extent required, Claircom respectfully requests the Commission to waive Section 1.45(a) of its rules and to accept the instant Opposition. Acceptance of Claircom's Opposition will aid the Commission in making the threshold determination of whether In-Flight's filing of its Application was procedurally defective and will not harm In-Flight since its Application has yet to be placed on public notice for comments.

earlier this year established a June 1, 1992 deadline for filing pioneer's preference requests for services in the affected 900 MHz frequencies5/, In-Flight also submitted its Petition in which it asserts that the June 1, 1992 deadline did not apply to the filing of its Application. In the alternative, In-Flight's Petition requests that the Commission waive the June 1 deadline and accept In-Flight's late-filed Application. Petition at 6-10.

In-Flight's Application and Petition were filed in connection with an experimental license issued by the FCC to In-Flight in February 1992 authorizing In-Flight to provide a ground-to-air broadcast retransmission service on an experimental basis.6/ At the time it filed its Experimental License Application, In-Flight also filed a Petition for Rulemaking requesting the Commission to initiate a rulemaking proceeding to allocate spectrum in the 900 MHz band to its proposed live news, weather, and sports broadcast audio retransmission service ("Petition for Rulemaking"). The Commission, however, denied In-Flight's Petition for Rulemaking.7/

5/ See Public Notice (22922), released April 30, 1992.

6/ See FCC Form 442 Application, FCC File No. 2234-EX-PL-91, filed September 10, 1991 ("Experimental License Application"). In-Flight proposed to provide airline passengers an audio information and entertainment service consisting of 12 channels of retransmitted broadcast programming.

7/ By letter dated October 1, 1991, the FCC denied the Petition for Rulemaking without prejudice to refiling because In-Flight had not explained how the proposed service could coexist with Navy shipboard radars which operate between 850-942 MHz; the FCC stated that in the absence of a showing to the contrary, it is

(continued...)

In-Flight's Application seeks a pioneer's preference for a 900 MHz PCS license to provide a commercial ground-to-air audio broadcast retransmission service. In-Flight's Petition asserts that it would be "unlawful" for the Commission not to accept its Application because Section 1.402(c) of the Commission's Rules requires it "to accept an application seeking a pioneer's preference for a particular service as long as the application is filed before any filing deadline which the FCC has set for applications relating to such services." Petition at 6. In-Flight claims that the Commission's June 1, 1992 deadline for pioneer's preference requests for PCS services proposing to operate in the 900 MHz PCS bands only applied to "certain" types of services, which services did not include its proposed airline broadcast retransmission service. See Petition at 1, 6-7.

As more fully set forth below, the Commission did not intend for a ground-to-air broadcast retransmission service to be licensed as a 900 MHz PCS service. Since its broadcast retransmission service cannot be licensed as a 900 MHz PCS service, In-Flight's request for a pioneer's preference was erroneously filed in ET Docket No. 92-100. Instead, In-Flight should have submitted with its Application a separate petition

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7/ (...continued)
concerned that these government radars might cause harmful interference to airborne receivers used in connection with the proposed broadcast retransmission service or that ground stations in the broadcast retransmission service might cause harmful interference to the radars, or both. Although In-Flight was able to resolve NTIA's concerns, In-Flight never refiled a petition for rulemaking.

for rulemaking requesting the Commission to initiate a rulemaking proceeding to allocate spectrum for ground-to-air broadcast retransmission services. In-Flight's failure to file the required petition for rulemaking renders its Application procedurally defective and requires its dismissal.

II. IN-FLIGHT'S GROUND-TO-AIR BROADCAST RETRANSMISSION SERVICE IS NOT ELIGIBLE TO BE LICENSED AS A 900 MHZ PCS SERVICE AND THEREFORE ITS APPLICATION WAS WRONGLY FILED IN ET DOCKET NO. 92-100

Section 1.402(a) authorizes the filing of requests for pioneer's preferences in two situations. First, a petitioner may submit a separate request that it be awarded a pioneer's preference in connection with the filing of a petition for rule making that "seeks an allocation of spectrum for a new service ...". 47 C.F.R. § 1.402(a). Alternatively, where the FCC intends to initiate a rule making proceeding to authorize a new spectrum-based service or technology, the Commission may announce a specific deadline for filing pioneer's preference requests. See 47 C.F.R. §1.402(c). In the latter case, the applicant need not file a rule making petition but only a preference request. See 47 C.F.R. §1.402(a).8/

As set forth below, In-Flight's proposed ground-to-air broadcast retransmission service does not fall within the scope

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8/ An applicant that believes that it can implement a new technology or service without a rule change may request a waiver of Section 1.402(a) to permit it to file a pioneer's preference request without filing a petition for rule making. See 47 C.F.R. § 1.402(b).

of ET Docket No. 92-100, and a petition for rulemaking was not filed with In-Flight's Application. In-Flight's Application therefore is procedurally defective and must be dismissed.

A. Ground-To-Air Broadcast Retransmission Services Are Outside The Scope Of ET Docket No. 92-100.

In-Flight's Petition and Application fail to make any attempt to show that a ground-to-air broadcast retransmission service is eligible to be licensed as a 900 MHz PCS service.9/ In-Flight assumes that its experimental service is eligible to be licensed as a 900 MHz PCS service since it is authorized to provide its experimental ground-to-air broadcast retransmission service in a portion of the 900 MHz frequency band that is being allocated to PCS in ET Docket No. 92-100. See Application at 5-6. In its PCS rulemaking deliberations, however, the Commission expressly determined that broadcasting services would not be authorized on PCS frequencies. It appears clear that In-Flight's proposed broadcast retransmission service constitutes such a prohibited "broadcast" service and, accordingly, cannot be licensed as a 900 MHz PCS service.

In its Notice, the Commission proposed that PCS services be defined as:

9/ Although In-Flight's Experimental License Application and related filings refer to its experimental service as a "broadcast retransmission" service, all references to "broadcast" have been dropped from its Application and Petition and its experimental service has been re-characterized as a "live airline audio service" in an apparent attempt to disguise its "broadcast" nature. Indeed, the experimental license issued by the FCC to In-Flight also describes the experimental service as a "broadcast retransmission service."

> [A] family of mobile or portable radio communications services which could provide services to individuals and business, and be integrated with a variety of competing networks.

Notice at ¶29. Notwithstanding this broad proposed definition of PCS services, however, the Commission expressly proposed that "spectrum allocated for PCS not be used for broadcasting service" as defined in the Communications Act of 1934, as amended (the "Act"). Id. at ¶30 (footnote omitted).10/

According to materials submitted by In-Flight in connection with its Experimental License Application, its ground-to-air broadcast retransmission service will retransmit several channels of "live" programming to aircraft "relying solely on programs that are currently being offered on various broadcast stations throughout the country."11/ In other words, In-Flight's broadcast retransmission service will simply retransmit to aircraft live programming broadcast by conventional broadcast radio stations. It is apparently In-Flight's position that such a retransmission service would not constitute a "broadcasting service" as that term was used by the Commission when it proposed restricting PCS spectrum to non-broadcast communications

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10/ "Broadcasting" is defined by the Act to mean "the dissemination of radio communications intended to be received by the public, directly or by the intermediary of relay stations." 47 U.S.C. §153(o).

11/ See Letter from William J. Gordon to Robert Ungar, dated February 6, 1992. In-Flight's system will "simply up-link these programs to aircraft." Id.

services. In-Flight has not offered any explanation or support for this position.

In-Flight's proposed service is functionally an aeronautical radio broadcast service, i.e., airline passengers aboard aircraft will be able to listen to live conventional radio broadcasts. It thus appears clear that the Commission's restriction against PCS frequencies being used for broadcasting services would apply to In-Flight's proposed broadcast retransmission service. This interpretation is consistent with the Communication Act's definition of "broadcasting," which expressly includes radio communications received by the public via "relay stations," i.e., the retransmission of broadcast station signals.12/ Because broadcast retransmission services are not eligible to be licensed in the 900 MHz band as PCS, In-Flight's Application was erroneously filed in ET Docket No. 92-100 and should be dismissed.

12/ The fact that In-Flight's retransmission service will be received by a limited "public", i.e., passengers aboard aircraft, does not necessarily transform the character of the service to a non-broadcast service. The courts have previously held that non-traditional broadcast services targeted a narrower subscribing "public" (such as direct broadcast satellite services constitute "broadcasting" within the meaning of the Act. See National Association of Broadcasters v. FCC, 740 F.2d 1190, 1120-1202 (D.C. Cir. 1984).

Even if the definition of "broadcasting" under the Communications Act was narrowly read so as not to encompass a ground-to-air broadcast retransmission service, by simply retransmitting conventional radio station signals to the flying public, such service is sufficiently "broadcast" in character and function to fall within the scope of the services intended by the FCC to be excluded from the PCS frequency allocations.

B. Since Broadcast Retransmission Services Are Not Eligible To Be Licensed In The 900 MHz PCS Band, In-Flight's Application Was Erroneously Filed In ET Docket No. 92-100 And Should Have Been Accompanied By A Petition For Rulemaking.

Given that In-Flight's Application cannot be considered in ET Docket No. 92-100, its Application can only be accepted and considered under Section 1.402 of the Commission's Rules if it is accompanied by a separate rulemaking petition seeking an allocation of spectrum to its proposed service. In-Flight did not file a petition for rulemaking in connection with the filing of its Application. Thus, such failure renders In-Flight's Application procedurally defective under Section 1.402(c), requiring the denial of In-Flight's Petition and dismissal of its Application.

III. ASSUMING ARGUENDO THAT BROADCAST RETRANSMISSION SERVICES ARE ELIGIBLE TO BE LICENSED AS A 900 MHZ PCS SERVICE, IN-FLIGHT'S PETITION MUST NEVERTHELESS BE DENIED BECAUSE ITS APPLICATION IS FILED GROSSLY OUT OF TIME

A. In-Flight's Pioneer's Preference Request Was Subject To The June 1, 1992 Filing Deadline.

As previously mentioned, by Public Notice dated April 30, 1992, the Commission established in ET Docket 92-100 a June 1, 1992 deadline for the filing of all requests for pioneer's preferences for narrowband services in the 900 MHz range. In both its Application and Petition, In-Flight concedes that it was submitting its request for a pioneer's preference long after the June 1, 1992 filing deadline. See Petition at 2-3; Application at 1. In-Flight, however, asserts, with little

support or explanation, that the April 30 Public Notice was limited only to "certain" services and did not include In-Flight's proposed ground-to-air broadcast retransmission service. Specifically, In-Flight claims that the Public Notice applied only to requests for pioneer's preferences for "narrowband mobile data and paging services" which services it asserts do not include its proposed airline broadcast retransmission service.13/ See Petition at 2-3. Assuming arguendo that ground-to-air broadcast retransmission services are eligible to be licensed in the 900 MHz PCS bands, In-Flight's claim that its Application was not subject to the June 1, 1992 filing deadline requests for pioneer's preferences is erroneous.

Notwithstanding In-Flight's self-serving protestations, it is apparent that the Commission's April 30, 1992 deadline for filing pioneer's preference requests for services proposing to operate in the 900 MHz PCS frequency range applied to all such services and not only "certain" types of services. In-Flight's assertion that the Public Notice only applied to proposals for "narrowband data or paging services" and did not include its broadcast retransmission service is unavailing. Although the

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13/ In-Flight argues that the April 30, 1992 Public Notice established a deadline for filing pioneer's preference applications for "narrowband mobile data and paging services" in certain frequency bands. It further asserts that the Commission's Notice, issued shortly after the deadline, proposed that such bands be used not just for mobile data and paging services, but also for any and all narrowband mobile services, including In-Flight's live audio news, information and entertainment service." Petition at 2-3.

Public Notice references narrowband data and paging services in the 900 MHz range, the notice also makes clear that the deadline applied to all pioneer's preference requests "relating to a specific new spectrum-based service or technology" proposing to operate in the 900 MHz range. In fact, applications filed in response to the April 30, 1992 deadline were not limited to narrowband data and paging services, but also included, for example, a proposal for two-way enhanced cordless telephone service. See Notice at ¶48. Thus, the June 1, 1992 deadline announced in the April 30 Public Notice encompassed all requests for pioneer's preferences for services in the 900 MHz bands.14/

Thus, assuming arguendo that In-Flight's proposed ground-to-air broadcast retransmission service is eligible to be

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14/ In-Flight claims that it had "neither actual nor constructive notice" of the scope of the services that the Commission would propose to be authorized in the 900 MHz bands. See Petition at 3. The scope of the services proposed by the Commission, however, is irrelevant because the Commission's April 30, 1992 Public Notice gave adequate notice of the scope of the services subject to the June 1 deadline for pioneer's preferences for narrowband services in the 900 MHz frequency band. Thus, the April 30, 1992 Public Notice broadly referenced all new services proposed for licensing in the 900 MHz band and provided In-Flight with adequate notice of the broad scope of service subject to the June 1, 1992 deadline. When the April 30, 1992 Public Notice was issued, In-Flight had already been authorized to provide its experimental service on frequencies in this band. It was incumbent upon In-Flight to keep apprised of any developments affecting this band on a timely basis. In any event, the latest In-Flight was placed on notice of the broad scope of services to be considered in ET Docket No. 92-100 was on August 14, 1992, the date the rulemaking notice was released. It has offered no explanation for its delaying the filing of its Application nor any basis for accepting its Application and Petition more than two and one-half months later.

licensed as a 900 MHz PCS service, it is clear that the Commission's June 1, 1992 deadline covered pioneer's preference requests for all new services proposing to be licensed in the 900 MHz band. It also is clear that its Public Notice provided adequate notice of the intended scope of the requests subject to the deadline. Since In-Flight did not file its Application until October 30, 1992, almost five months late, its Petition must be denied and its Application dismissed as untimely filed.

B. No Legitimate Basis Exists For Waiving The June 1 Filing Deadline.

In-Flight's Petition requests that the Commission waive the June 1 pioneer's preference filing deadline and accept In-Flight's late-filed Application. See Petition at 7. In considering whether to grant In-Flight's waiver request, the Commission must consider the severe disruption to its processes that acceptance of the Application at this late date is certain to cause. First, the Commission has already issued a notice of proposed rulemaking in ET Docket No. 92-100 and, in its Notice, the Commission has tentatively awarded a single pioneer's preference to Mobile Telecommunication Technologies Corporation ("MTTC"). See Notice at ¶¶149-151.

Acceptance of In-Flight's Application at this stage in the proceeding would require the Commission's adoption of special procedures (i) to accommodate public comment on In-Flight's Application, (ii) to provide the opportunity for other parties to file pioneer's preference requests for similar services, and

(iii) to allow the Commission to consider and prepare a tentative decision regarding such requests. Such procedures would result in the expenditure of additional resources and cause severe administrative inconvenience and delays. Most importantly, such delays would be grossly unfair to the parties that filed timely pioneer's preference requests in this proceeding.15/

In-Flight has not presented the compelling public interest considerations that are necessary to justify the grant of a waiver. Accordingly, In-Flight's Petition must be denied and its Application dismissed.

IV. IN-FLIGHT'S STATEMENT REGARDING CLAIRCOM'S EXPERIMENTAL LICENSE APPLICATION IS PATENTLY FALSE

In the event that the Commission disagrees with Claircom and decides to accept In-Flight's Application and solicit comments on the Application, Claircom intends to file comments opposing In-Flight's preference request and is reserving the right herein to address the merits of In-Flight's pioneer's preference. Claircom nevertheless believes it appropriate to clear the record and respond briefly to In-Flight's reckless and inaccurate claim that Claircom's experimental license application "plagiarized" from In-Flight's earlier filed Experimental License

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15/ To the extent that the Commission determined that it was necessary to revisit its tentative pioneer's preference award to MTTC in order to consider In-Flight's Application, principles of administrative finality and general principles of equity could be compromised.

Application and Petition for Rulemaking."16/ Application at 10. In-Flight's self-serving and gratuitous statement is patently false, and represents nothing more than a clumsy and transparent attempt to preempt the future filing of a competing request for a pioneer's preference by Claircom.

The concept of providing live broadcast reception to airline passengers is not novel or innovative.17/ Nor is the concept of providing such ground-to-air communications via a matrix of ground stations deployed nationwide novel or innovative. Thus, the fact that Claircom also proposed a ground-to-air entertainment service does not provide a legitimate basis to support In-Flight's plagiarism allegation.18/

Because Claircom and In-Flight both propose to develop and test ground-to-air broadcast retransmission services, it is not surprising that there are superficial similarities between

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16/ Claircom filed an experimental license application on April 10, 1992, requesting authority to provide a ground-to-air video and audio broadcast retransmission service. See File No. 3071-EX-PL-90 ("Claircom Application"). The Commission issued to Claircom an experimental license in August 17, 1992.

17/ Indeed, In-Flight's Experimental License Application file contains a letter from American Airlines to the FCC in support of In-Flight's experimental license application that states "[f]or several years we have wanted to provide live radio capabilities on our aircraft." Letter from Avery Coryell to Bob Ungar, dated January 31, 1992.

18/ Similarly, since the concept of a broadcast retransmission service is hardly novel or innovative, the fact that Claircom filed its experimental application subsequent to the filing of In-Flight's application can not support In-Flight's plagiarism allegation or be a basis for demonstrating that In-Flight's proposal is "innovative" and Claircom's is not.

the two experimental license application proposals. Such superficial similarities, however, believe the reality that the two proposals were markedly different.

First, whereas In-Flight originally proposed purely "analog" transmissions, Claircom proposed to test both analog and digital transmission techniques for providing its experimental ground-to-air services.19/ Claircom Application, Exhibit 2 at 2. Second, only Claircom proposed to conduct experiments in the ground-to-air transmission of video programming.

Third, the two proposals requested different bandwidths and different frequencies. Claircom sought authorization for 250 kHz in the 901.500 to 901.75 MHz band; on the other hand, In-Flight's request sought experimental authorization for 500 kHz in both the 901-901 MHz and 940-941 MHz bands. Fourth, where Claircom proposed five channels of service; In-Flight proposed nine channels. In addition, in demonstrating the need for their respective proposed broadcast retransmission services, Claircom and In-Flight relied on different market data.

Thus, there is little doubt that Claircom and In-Flight proposed in their respective experimental license applications to provide experimental ground-to-air broadcast retransmission services that were vastly different not only in the nature of the

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19/ In its Experimental License Application, In-Flight proposed single sideband emissions, which of course are analog operations. See Experimental License Application, Exhibit 1. It appears that In-Flight proposed a digital system only after Claircom filed its application in which it proposed to test both analog and digital operations.

service proposed, but also in significant technical respects. Given these fundamental differences, it is obvious that there is no legitimate basis for In-Flight's allegation that Claircom plagiarized its earlier filed pleadings.

IV. CONCLUSION

For the reasons set forth herein, Claircom urges the Commission to deny In-Flight's Petition for Acceptance of Application or Rule Waiver and to dismiss its Application for Pioneer's Preference to Operate a Live Audio News, Information, and Entertainment Service for Airline Passengers on the 901-902 and 940-941 MHz Bands.

Respectfully Submitted,

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Dated: February 3, 1993

CERTIFICATE OF SERVICE

I, Dana S. Gregory, hereby certify that a copy of the foregoing "Opposition to Petition for Acceptance of Application or Rule Waiver and Limited Opposition to Application for Pioneer's Preference" has been sent via first class mail to the following on this 3rd day of February, 1993:

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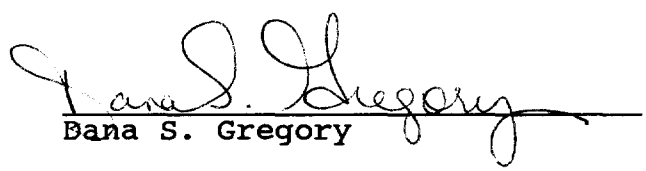

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